

**WASHINGTON STATE DEPARTMENT OF ECOLOGY  
EASTERN REGIONAL OFFICE  
4601 NORTH MONROE  
SPOKANE, WASHINGTON 99205-1295**

IN THE MATTER OF THE COMPLIANCE BY	)	AIR OPERATING PERMIT
STIMSON WASHINGTON, INC.	)	No. 02AQER-4008
ARDEN SAWMILL; LOCATED IN ARDEN, WA	)	
634 Highway 395 South, Colville, Washington 99114	)	<b>FINAL PERMIT</b>
with Section 70.94.161 RCW, Operating Permits for	)	<b>2<sup>nd</sup> Revision</b>
Air Contaminant Sources, and the applicable rules and	)	
regulations of the Department of Ecology	)	

To: Stimson Washington, Inc.  
520 SW Yamhill, Suite 308  
Portland, Oregon 97204

Issuance Date:	<u>May 4, 2004</u>
Effective Date:	<u>May 4, 2004</u>
Expiration Date:	<u>June 1, 2007</u>

**Responsible Official:** Mr. Dan Sweeney

**Legal Authority:** This Air Operating Permit is issued under the authority and provisions of the Federal Clean Air Act (FCAA), (42 U.S.C. 7401, et seq.), the Washington Clean Air Act, Chapter 70.94 Revised Code of Washington (RCW) and the Operating Permit Regulation, Chapter 173-401 Washington Administrative Code (WAC).

Hereinafter, Stimson Washington, Inc., Arden Sawmill is called the permittee. The permittee is required to comply with the provisions contained within this permit.

The Renewal Air Operating Permit, DATED at Spokane, Washington, the 28<sup>th</sup> day of May, 2002. The 1<sup>st</sup> Revision, DATED at Spokane, Washington, the 14<sup>th</sup> day of March, 2003. This 2<sup>nd</sup> Revision, DATED at Spokane, Washington, this 4<sup>th</sup> day of May, 2004.

PREPARED BY:

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## LIST OF ABBREVIATIONS

AOP	Air Operating Permit
BACT	Best Available Control Technology
BTU	British Thermal Units
°C	Degrees Celsius
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon Monoxide
COMS	Continuous Opacity Monitoring System
dscf	Dry Standard Cubic Foot
dscf/m	Dry Standard Cubic Foot per minute
Ecology	Washington State Department of Ecology
E.I.T.	Engineer in Training
EPA	United States Environmental Protection Agency
°F	Degrees Fahrenheit
FCAA	Federal Clean Air Act
FDCP	Fugitive Dust Control Plan
ft <sup>3</sup>	Cubic foot
gr/dscf	Grain per dry standard cubic foot
hr	Hour
MMBtu	Million British Thermal Units
MRRR	Monitoring, Recordkeeping, and Reporting Requirement
MVAC	Motor Vehicle Air Conditioner
N <sub>2</sub>	Nitrogen gas
NOC	Notice of Construction
NO <sub>x</sub>	Oxides of Nitrogen
NSPS	New Source Performance Standard
O <sub>2</sub>	Oxygen
O&M	Operation & Maintenance
P.E.	Professional Engineer
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with aerodynamic diameter ≤ 10 micrometers
ppm	Parts per million
QIP	Quality Improvement Plan
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RCW	Revised Code of Washington
RM	EPA Reference Method from 40 CFR Part 60, Appendix A
scfm	Standard Cubic Feet per Minute
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
TAP	Toxic Air Pollutant
TPD	Tons Per Day
TPY	Tons Per Year
TSP	Total Suspended Particulate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code
yr	Year

All information required for submittal throughout this permit, is to be submitted to Ecology, EPA, or both as specified by the applicable requirement, at the following addresses:

Air Quality Program  
Department of Ecology  
4601 North Monroe  
Spokane, Washington 99205-1295

U.S. EPA Region 10 Administrator  
Air Permits MS: OAQ-108  
1200 Sixth Avenue  
Seattle, Washington 98101

## **1. STANDARD CONDITIONS**

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### **1.1 Permit Shield**

**1.1.1** Compliance with the terms and conditions of this permit shall be deemed compliance with those applicable requirements that are specifically included and identified in this permit as of the date of permit issuance.

**1.1.2** The permit shield shall not apply to any insignificant emissions unit or activity designated under WAC 173-401-530.

[WAC 173-401-530(3), 09/16/02 ], [WAC 173-401-640(1), 09/16/02 ]

**1.2 Enforceability** All terms and conditions of the permit are enforceable by the EPA and citizens unless specifically designated as state-only enforceable.

[WAC 173-401-625, 09/16/02 ]

**1.3 Permit Fees** The permittee shall pay fees as a condition of this permit in accordance with Ecology's fee schedule. Failure to pay fees in a timely fashion shall subject the permittee to civil and criminal penalties as prescribed in chapter 70.94 RCW. Ecology may revoke this operating permit if the permit fees are not paid, per WAC 173-401-930(3).

[WAC 173-401-620(2)(f), 930(3), 09/16/02 ], [RCW 70.94.162(1), 1/4/01 (S)], [Order No. DE 00AQER-1615 2<sup>nd</sup> Amendment, Issued 10/21/03 , Approval Condition 9.8]

**1.4 Permit Continuation** This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted.

[WAC 173-401-620(2)(j), 09/16/02 ]

**1.5 Property Rights** This permit does not convey any property rights of any sort, or any exclusive privilege.

[WAC 173-401-620(2)(d), 09/16/02 ]

**1.6 Inspection and Entry** Upon presentation of credentials and other documents as may be required by law, the permittee shall allow Ecology, EPA, or an authorized representative to perform the following:

**1.6.1** Enter upon the permittee's premises where a chapter 401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

**1.6.2** Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.

**1.6.3** Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

**1.6.4** As authorized by WAC 173-400-105 and the FCCA, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.

**1.6.4.1** Ecology may require the permittee to conduct stack testing and/or ambient air monitoring and report the results to Ecology.

**1.6.4.2** Ecology may conduct or require that a test be conducted using approved methods from 40 CFR parts 51, 60, 61 and 63 (in effect on February 20, 2001), or Ecology's Source Test Manual – Procedures for Compliance Testing. The permittee shall be required to provide platform and sampling ports. Ecology shall be allowed to obtain a sample from any emissions unit. The permittee shall be given the opportunity to observe the sampling and to obtain a sample at the same time.

**1.6.5** No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties.

**1.6.6** Nothing in this condition shall limit the ability of EPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the FCAA.

[WAC 173-401-630(2), 09/16/02 ], [WAC 173-400-105(2), (4), 8/20/93, 07/11/02 (S)], [RCW 70.94.200, 1/4/01 (S)], [Order No. DE 92AQ-E145 2<sup>nd</sup> Amendment, Issued 01/18/96, Approval Conditions 7.2, 8.5], [Order No. DE 93AQ-E113 1<sup>st</sup> Amendment, Issued 10/21/03 , Approval Conditions 7.1, 7.4, 8.5], [Order No. DE 00AQER-1615 2<sup>nd</sup> Amendment, Issued 10/21/03 , Approval Conditions 2.1, 2.2, 9.3]

**1.7 Duty to Comply** The permittee must comply with all conditions of this chapter 173-401 operating permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.

[WAC 173-401-620(2)(a), 09/16/02 ], [Order No. DE 93AQ-E113 1<sup>st</sup> Amendment, Issued 10/21/03 , Approval Condition 8.8]

**1.8 Duty to Provide Information** The permittee shall furnish to Ecology, within a reasonable time, any information that Ecology may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to Ecology copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to Ecology along with a claim of confidentiality. Ecology shall maintain confidentiality of such information in accordance with RCW 70.94.205.

No person shall make any false material statement, representation or certification in any form, notice or required report. No person shall render inaccurate any required monitoring device or method.

[WAC 173-401-620(2)(e), 09/16/02 ], [WAC 173-400-105(7), (8), 08/20/93, 07/11/02 (S)]

**1.9 Duty to Supplement or Correct Application** The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

[WAC 173-401-500(6), 09/16/02 ]

**1.10 Need to Halt or Reduce Activity not a Defense** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

[WAC 173-401-620(2)(b), 09/16/02 ]

**1.11 Excess Emissions Due to an Emergency** The permittee may seek to establish that noncompliance with a technology-based<sup>1</sup> emission limitation under this permit was due to an emergency.<sup>2</sup> To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

**1.11.1** An emergency occurred and that the permittee can identify the cause(s) of the emergency;

**1.11.2** The permitted facility was being properly operated at the time of the emergency;

**1.11.3** During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit; and

**1.11.4** The permittee submitted notice of the emergency to Ecology within two (2) working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. E-mail or fax are the preferred notification methods. The notice should be directed to appropriate air quality personnel at Ecology's Eastern Regional Office using the most recent contact information.

[WAC 173-401-645, 09/16/02 ]

**1.12 Unavoidable Excess Emissions** Excess emissions determined to be unavoidable under the procedures and criteria in WAC 173-400-107 shall be excused and not subject to penalty.

**1.12.1** The permittee shall have the burden of proving to Ecology that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under 1.12.2, 1.12.3, or 1.12.4.

**1.12.2** Excess emissions due to startup or shutdown conditions shall be considered unavoidable provided the source reports as required under Condition 1.13.1 and adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage.

**1.12.3** Excess emissions due to scheduled maintenance shall be considered unavoidable if the source reports as required under Condition 1.13.1 and adequately demonstrates that the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.

**1.12.4** Excess emissions due to upsets shall be considered unavoidable provided the source reports as required under Condition 1.13.1 and adequately demonstrates that:

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<sup>1</sup> Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain a health based air quality standard.

<sup>2</sup> An "emergency" means any situation arising from sudden and reasonably enforceable events beyond the control of this source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes this source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 1.12.4.1** The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition.
- 1.12.4.2** The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance.
- 1.12.4.3** The operator took immediate and appropriate corrective action in a manner consistent with good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded.

[WAC 173-400-107, 8/20/93, 07/11/02 (S)]

## **1.13 Reporting**

- 1.13.1 Monthly Deviation Reports** The permittee shall report deviations from permit requirements, including those attributable to upset conditions as defined in this permit, and include the following information: the time the deviation occurred, the duration of the deviation, the magnitude of the deviation, the probable cause of the deviation, and any corrective actions or preventive measures taken. Such deviations shall be reported “promptly” to Ecology at the address included in this permit and may be submitted via e-mail or fax to the appropriate Ecology personnel.

For deviations which represent a potential threat to human health or safety, “promptly” means as soon as possible, but in no case later than twelve (12) hours after the deviation is discovered. For deviations which the source believes to be unavoidable, “promptly” means as soon as possible. No later than thirty days after the end of each month, the permittee shall submit a report describing other deviations that were discovered that month or stating that no other deviations were discovered. Upon request by Ecology, the permittee shall submit a full written report including further details regarding the known causes, the corrective actions taken, and the preventative measures to be taken to minimize or eliminate the chance of recurrence. The permittee shall maintain a contemporaneous record of all deviations. Responsible official certification in accordance with Condition 1.13.5 of monthly deviation reports shall be included in each semi-annual monitoring report covering all deviation reports made during the previous six month period.

[WAC 173-401-615(3)(b), 09/16/02 ], [WAC 173-400-107, 8/20/93, 07/11/02 (S)]

- 1.13.2 Semi-Annual Monitoring Reports** The permittee shall submit semi-annual reports which include monitoring, recordkeeping, and/or reporting information required to be reported under Section 3 of this permit unless stated otherwise in a specific MRRR. Six month periods shall be measured from the first of June 2002. Semi-annual monitoring reports shall be due no later than forty-five (45) days following the end of each six (6) month period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with Condition 1.13.5.

[WAC 173-401-615(3)(a), 09/16/02 ]

- 1.13.3 Compliance Certifications** The permittee shall submit a certification of compliance with permit terms and conditions at least once per year. The original compliance certification submitted under this permit included certification for the period beginning on the first of June 2002 and ending twelve (12) months from this date. Subsequent certification periods shall be twelve (12) months. All certifications shall be submitted no later than forty-five (45) days following the end of the certification period. Ecology may require that compliance certifications be submitted more

frequently for those emission units not in compliance with permit terms and conditions, or where more frequent certification is specified in the applicable requirement.

[WAC 173-401-630(5)(a), 09/16/02 ], [WAC 173-401-630(1), 09/16/02 ]

**1.13.3.1** The certification shall describe and include the following:

**1.13.3.1.1** The permit term or condition that is the basis of the certification.

**1.13.3.1.2** The current compliance status.

**1.13.3.1.3** Whether compliance was continuous or intermittent.

**1.13.3.1.4** The methods used for determining compliance, currently and over the reporting period consistent with WAC 173-401-615(3)(a).

**1.13.3.1.5** Such other facts as the authority may require to determine the compliance status of the source.

[WAC 173-401-630(5)(c), 09/16/02 ]

**1.13.3.2** All compliance certifications shall be submitted to Ecology and EPA Region 10 at the respective addresses included in this permit.

[WAC 173-401-630(5)(d), 09/16/02 ]

**1.13.3.3** The permittee need not certify compliance for insignificant emission units or activities.

[WAC 173-401-530(2)(d), 09/16/02 ]

**1.13.3.4** All compliance certifications shall include certification by a responsible official in accordance with WAC 173-401-520.

**1.13.3.5** For the purpose of submitting compliance certifications, or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test had been performed.

[40 CFR 52.33(a), 07/01/01], [40 CFR 60.11(g), 07/01/01]

**1.13.4 Emission Inventory** The permittee shall submit an inventory of actual emissions from the source for each calendar year. The inventory shall include segmented stack and fugitive emissions of TSP, PM-10, SO<sub>2</sub>, CO, NO<sub>x</sub>, lead, and VOC's, and shall be submitted no later than **April 15<sup>th</sup>** of the following year. The source shall maintain records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. Emissions inventories shall be sent to Ecology at the address included in this permit.

[WAC 173-400-105(1), 8/20/93, 07/11/02 (S)]

**1.13.5 Submittals** Reports, test data, monitoring data, notifications, certifications, and applications (including requests for renewal) shall be submitted to Ecology at the address included in this permit. Any document submitted to Ecology pursuant to this permit shall contain certification of truth, accuracy, and completeness by a responsible official. All certifications shall state that *"based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete"*. The permittee shall promptly, upon discovery, report to Ecology any material error or omission in these records, reports, plans or other documents.



[WAC 173-401-520, 09/16/02 ], [WAC 173-401-500(6), 09/16/02 ]

- 1.14 Severability** If any provision of this permit, or application of any provision of this permit, is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable.

[WAC 173-401-620(2)(h), 09/16/02 ], [RCW 70.94.905, 1/4/01 (S)]

**1.15 Administrative Permit Amendments**

- 1.15.1** An administrative permit amendment is a permit revision that:

- 1.15.1.1** Allows for a change in ownership or operational control of this source where the permitting authority has determined that no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to Ecology;
- 1.15.1.2** Corrects typographical errors within the permit;
- 1.15.1.3** Identifies a change in the name, address, or phone number of any person identified in the permit, or provides for a similar minor administrative change at the source;
- 1.15.1.4** Requires more frequent monitoring or reporting by the permittee;
- 1.15.1.5** Incorporates into the permit the terms, conditions, and provisions from orders approving notice of construction applications processed under an EPA-approved program, provide that such a program meets procedural requirements substantially equivalent to the requirements of WAC 173-401-700, 173-401-725, and 173-401-800 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in WAC 173-401-600 through 173-401-650.

- 1.15.2** The source may implement the changes addressed in the request for an administrative amendment immediately upon submittal of the request.

- 1.15.3** The permitting authority shall, upon taking final action granting a request for an administrative permit amendment, allow coverage by the permit shield in WAC 173-401-640 for administrative permit amendments made pursuant to condition 1.15.1.5 above.

[WAC 173-401-720, 09/16/02 ]

- 1.16 Permit Actions** This operating permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[WAC 173-401-620(2)(c), 09/16/02 ]

**1.17 Reopening for Cause**

- 1.17.1** Ecology will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:

- 1.17.1.1** Additional requirements under the FCAA become applicable to a major source three (3) or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless the original permit or any of its terms and conditions have been extended pursuant to WAC 173-401-620(2)(j).

**1.17.1.2** Ecology or the Administrator determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

**1.17.1.3** Ecology or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

**1.17.2** Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

**1.17.3** Reopenings shall not be initiated before a notice of intent to reopen is provided to the permittee by Ecology at least 30 days in advance of the date that this permit is to be reopened, except that Ecology may provide a shorter time period in the case of an emergency.

**1.17.4** All permit conditions remain in effect until such time as Ecology takes final action.

[WAC 173-401-730, 09/16/02 ]

**1.18 Off-Permit Changes** The permittee is allowed to make certain changes that are not specifically addressed or prohibited by this permit without a permit revision. All such changes must meet the following conditions:

**1.18.1** The proposed changes shall not weaken the enforceability of any existing permit conditions.

**1.18.2** Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition.

**1.18.3** Before or contemporaneously with making the permit change, the permittee must provide written notice to Ecology and EPA Region 10 at the respective addresses included in this permit. Such written notice shall describe each such change, including the date, any change in emissions or pollutants emitted, and any applicable requirements that would apply as a result of the change.

**1.18.4** The change shall not qualify for the permit shield under Condition 1.1.

**1.18.5** The permittee shall record all changes that result in emissions of any regulated air pollutant subject to any applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes. The record shall reside at the permitted facility.

**1.18.6** A source making a change under this section shall comply with the preconstruction review requirements established pursuant to Condition 1.20.

[WAC 173-401-724, 09/16/02 ]

## **1.19 Changes not Requiring Permit Revisions**

**1.19.1** *Section 502(b)(10) changes.* The permittee is authorized to make section 502(b)(10) changes, as defined in WAC 173-401-200(31), without a permit revision, providing the conditions included below are met. The permit shield as described in Condition 1.1 shall not apply to any change made pursuant to this paragraph.

**1.19.1.1** The proposed changes are not Title I (FCAA) modifications;

**1.19.1.2** The proposed changes do not result in emissions which exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions;

**1.19.1.3** The proposed changes do not alter permit terms that are necessary to enforce limitation on emissions from units covered by the permit;

**1.19.1.4** The facility provides Ecology and EPA with written notification at least seven days prior to making the proposed changes except that written notification of a change made in response to an emergency shall be provided as soon as possible after the event;

**1.19.1.4.1** The written notification shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

**1.19.2** *Changes related to Emissions trading under an emissions cap.* Pursuant to Condition 1.19.1, the permittee is authorized to trade increases and decreases in emission in the permitted facility, where the Washington state implementation plan provides for such emissions trades without requiring a permit revision. This provision is available in those cases where the permit does not already provide for such emissions trading. Such changes shall be subject to the following:

**1.19.2.1** The written notification required under Condition 1.19.1.4 shall include such information as may be required by the provision in the Washington SIP authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which the source will comply using the emissions trading provisions of the Washington SIP, and the pollutants emitted subject to the emissions trade. The notice shall also refer to the provisions with which the source will comply in the applicable implementation plan and that provide for the emissions trade. The notification shall state how any increases or decreases in emissions will comply with the terms and conditions of the permit. (The permit shield described under Condition 1.1 shall extend to terms and conditions that allow such increases and decreases.)

**1.19.2.2** The permit shield described in Condition 1.1 shall not extend to any change made under this paragraph. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the applicable implementation plan authorizing the emissions trade.

**1.19.2.3** Upon the request of the permit applicant, Ecology shall issue permits that contain terms and conditions, including all terms required under WAC 173-401-600 through 173-401-630 to determine compliance, allowing for the trading of emissions increases and decreases in the chapter 173-401 WAC source solely for the purpose of complying with a federally enforceable emissions cap that is established in the permit independent of otherwise applicable requirements. The permit applicant shall include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provision shall not be applied to any emissions units for which emission are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit shall also require compliance with all applicable requirements.

**1.19.2.4** A source making a change under this section shall comply with applicable preconstruction review requirements established pursuant to Condition 1.20.

**1.19.2.5** No permit revision shall be required, under any approved economic incentives, marketable permits, and other similar programs or processes for changes that are provided for in this permit such as emissions trading.

[WAC 173-401-722, 09/16/02 ], [WAC 173-401-620(2)(g), 09/16/02 ]

**1.20 New Source Review** The permittee shall not construct new sources or make modifications required to be reviewed under WAC 173-400-110, WAC 173-400-113, WAC 173-400-141, or WAC 173-460 before the permittee obtains written final approval from Ecology in accordance with those regulations, pays the appropriate fees required by WAC 173-400-116, and pays the cost of public notice described in WAC 173-400-171.

[WAC 173-400-110, 8/20/93, 07/11/02 (S)], [WAC 173-400-113, 8/20/93, 07/11/02 (S)], [WAC 173-400-116, 07/11/02 (S)], [WAC 173-400-141, 07/11/02 (S)], [WAC 173-400-171, 8/20/93, 07/11/02 (S)], [WAC 173-460, 7/21/98 (S)], [RCW 70.94.152, 1/4/01 (S)]

**1.21 Replacement or Substantial Alteration of Emission Control Technology.** Prior to replacing or substantially altering emission control technology subject to review under WAC 173-400-114, the permittee shall file for and obtain approval from Ecology according to that regulation. The permittee shall pay the appropriate fees required by WAC 173-400-045(4) prior to commencing construction.

[WAC 173-400-045(4), 07/11/02 (S)], [WAC 173-400-114, 07/11/02 (S)], [RCW 70.94.153, 1/4/01 (S)]

**1.22 Operational Flexibility**

**1.22.1** In the event that an emission unit is not operated during a period equal to or greater than the monitoring period designated, no monitoring is required. Recordkeeping and reporting must note the reason why and length of time that the emission unit was not operated.

**1.22.2** The permittee did not propose any further alternative operating scenarios.

[WAC 173-401-650, 09/16/02 ]

**1.23 Permit Appeals** This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board, P.O. Box 40903, Olympia, WA 98504-0903 and concurrently serving it on the Department of Ecology, P.O. Box 47600, Olympia, WA 98504-7600 and the Department of Ecology, Regional Air Quality Section, 4601 North Monroe, Spokane, WA 99205-1295 within thirty days of receipt of this permit, pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA.

[WAC 173-401-620(2)(i), 09/16/02 ]

**1.24 Federal Chlorofluorocarbons (CFC) Requirements – Title VI of the FCAA**

**1.24.1** The permittee shall comply with the following standards for recycling and emissions reductions pursuant to 40 CFR 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in subpart B.

**1.24.1.1** Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.

**1.24.1.2** Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

**1.24.1.3** Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

**1.24.1.4** Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. (“MVAC-like appliance” is defined at 40 CFR 82.152.)

**1.24.1.5** Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.

- 1.24.1.6** Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep servicing records documenting the date and type of service, as well as the quantity of refrigerant added. The owner/operator must keep records of refrigerant purchased and added to such appliances in cases where owners add their own refrigerant. Such records should indicate the date(s) when refrigerant is added pursuant to 40 CFR 82.166.
- 1.24.1.7** Persons conducting maintenance, service, repair, or disposal of appliances must follow the prohibitions pursuant to 40 CFR 82.154.
- 1.24.1.8** Person performing maintenance, service, repair, or disposal of appliances must certify to the Administrator that such person has acquired certified recovery of recycling equipment pursuant to 40 CFR 82.162.

**1.24.2** If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR 82, Subpart A – Production and Consumption Controls.

**1.24.3** If the permittee performs a service on motor (fleet) vehicles and when this service involves ozone depleting substance refrigerant in the MVAC, the permittee is subject to all applicable requirements as specified in 40 CFR 82, Subpart B – Servicing of Motor Vehicle Air Conditioners.

**1.24.4** The permittee shall be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program promulgated pursuant to 40 CFR 82, Subpart G – Significant New Alternative Policy Program.

[40 CFR 82, 07/01/01], [RCW 70.94.970, 1/4/01 (S)], [RCW 70.94.980, 1/4/01 (S)]

**1.25 Reasonably Available Control Technology (RACT)** Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance or renewal shall be considered RACT for the purpose of permit issuance or renewal. RACT determinations under section 8, chapter 252, Laws of 1993 shall be incorporated into an operating permit as provided in WAC 173-401-730.

[WAC 173-401-605(3), 09/16/02 ], [RCW 70.94.154, 1/4/01 (S)]

## **1.26 Compliance Schedules**

**1.26.1** The permittee shall continue to comply with applicable requirements with which it is currently in compliance. The permittee shall meet applicable requirements on a timely basis that become effective during the permit term.

[WAC 173-401-510(2)(h)(iii)(A), 09/16/02 ], [WAC 173-401-510(2)(h)(iii)(B), 09/16/02 ]

## **1.27 Record Keeping**

**1.27.1** The permittee shall keep records of required monitoring information that includes, where applicable, the following:

- 1.27.1.1** The date, place, and time of the sampling or measurements.
- 1.27.1.2** The date(s) analyses were performed.
- 1.27.1.3** The company or entity that performed the analysis.
- 1.27.1.4** The analytical techniques or methods used.
- 1.27.1.5** The results of such analyses.

**1.27.1.6** The operating conditions as existing at the time of sampling or measurement.

[WAC 173-401-615(2)(a), 09/16/02 ]

**1.27.2** The permittee shall keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

[WAC 173-401-615(2)(b), 09/16/02 ]

**1.27.3** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings from continuous monitoring instrumentation, and copies of all reports required by this permit.

[WAC 173-401-615(2)(c), 09/16/02 ]

**1.27.4** All required recordkeeping shall be available to Ecology in accordance with Condition 1.6.

[WAC 173-401-630(2)(b), 09/16/02 ], [40 CFR 60.7(b), 60.7(f), 07/01/01]

**1.28 General Obligation** Nothing in this permit shall alter or affect the following:

**1.28.1** The provisions of section 303 of the FCAA (emergency orders), including the authority of EPA under that section.

**1.28.2** The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.

**1.28.3** The applicable requirements of the acid rain program, consistent with section 408(a) of the FCAA.

**1.28.4** The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA.

**1.28.5** The ability of Ecology to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993.

[WAC 173-401-640(4), 09/16/02 ]

**1.29 Permit Renewal and Expiration** This permit is issued for a fixed term of 5 years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application (as outlined in WAC 173-401-510) is submitted at least 12 months, but no greater than 18 months prior to the date of permit expiration. A complete renewal application is due no later than June 1, 2006. Upon receipt of a timely and complete application for renewal, this source may continue to operate subject to final action by Ecology on the renewal application. This allowance shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by Ecology, any additional information identified as being needed to process the application. The application shall be sent to Ecology at the address included in this permit.

[WAC 173-401-610; 173-401-710, 09/16/02 ]

**1.30 Demolition and Renovation (asbestos)** Prior to, during and after conducting any activity to which 40 CFR 61, Subpart M – National Emission Standard for Asbestos, applies, the permittee shall comply with the requirements of that rule. Such activities include notification, demolition, renovation, asbestos stripping or removal, installing or reinstalling insulation, manufacturing of fabricating certain items, spraying of certain materials, constructing roadways of certain materials, or disposal.

[40 CFR 61, Subpart M, 07/01/01], [WAC 173-400-075(1), 07/11/02 (S)]

## 2. APPLICABLE REQUIREMENTS

Until this permit expires, is modified or revoked, this permittee is authorized to operate the processes outlined in Sections 2.1 through 2.7. These processes are subject to the conditions included in Sections 2.1, through 2.7, to the MRRR's listed in Section 3. Monitoring, Recordkeeping, and Reporting Requirements, and to other terms and conditions specified in this permit.

The column entitled **Description** in each table contains only a summary/paraphrase of the condition, emission standard or work practice. The condition, emission standard, or work practice itself is the enforceable requirement and should be referenced for actual language.

### Testing Requirements

Although there are many conditions with no on-going testing requirements, Ecology retains the authority to conduct or require that testing be conducted at the facility with respect to these conditions per WAC 173-400-105(4). Identification of the appropriate test method is necessary to make emission limits fully enforceable. Where the underlying applicable requirement does not specify the test method, Ecology has done so in this permit.

[WAC 173-401-615(1)(a)], [WAC 173-401-630(1)], [WAC 173-400-105(4)]

### 2.1 Section #1, Facility Wide

This section is applicable and enforceable with respect to all emission units source wide, including those emission units in Sections 2.2 through 2.7. Monitoring, recordkeeping and reporting requirements in this section do not apply to insignificant emission units. Condition numbers that are denoted with an asterisk indicate that streamlining of a less stringent requirement has taken place and is described in section 12.0 of the Statement of Basis.

**TABLE 2.1**

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal & State = F) (State Only = S)	Description	Testing	MRRR Reference
2.1.1	WAC 173-400-040(1), (1)(a), and (1)(b) 8/20/93 ----- WAC 173-400-040(1), (1)(a), and (1)(b) 07/11/02	F  ----- S	Visible emissions shall not exceed 20% opacity for more than 3 minutes in any one hour	RM 9A	<b>4M</b>
2.1.2	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 8.2 ----- NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Condition 8.2 ----- NOC DE00AQER- 1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 9.1	F  ----- F  ----- F	No Visible emissions beyond property line	RM 9 RM 22	<b>6M</b>

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal & State = F) (State Only = S)	Description	Testing	MRRR Reference
2.1.3	WAC 173-400-060 8/20/93 ----- WAC 173-400-060 07/11/02	F ----- S	General process units are required to meet all applicable provisions of WAC 173-400-040 and emissions of particulate material from any operation shall not exceed 0.1 grain/dscf of exhaust gas	RM 5	4M
2.1.4	WAC 173-400-040(2) 07/11/02	S	Particulate matter shall not be deposited beyond the property in sufficient quantity to interfere unreasonably with the use and enjoyment of other's property		3M
2.1.5	WAC 173-400-040(3)(a), (8)(a) 8/20/93 ----- WAC 173-400-040(3)(a), (8)(a) 07/11/02	F ----- S	The source shall perform maintenance to minimize emissions and take reasonable precautions to prevent fugitive dust from becoming airborne		3M
2.1.6	WAC 173-400-040(3)(a), (8)(a) 07/11/02 ----- NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 8.4	S ----- F	Fugitive dust control measures shall be taken to prevent fugitive emissions in accordance with the Fugitive Dust Control Plan		5M
2.1.7	WAC 173-400-040(4) 07/11/02	S	Any producer of an odor which may unreasonably interfere with any other property owner's use and enjoyment of his property must reduce these odors to a reasonable minimum		3M
2.1.8	WAC 173-400-040(5) 8/20/93 ----- WAC 173-400-040(5) 07/11/02	F ----- S	No person shall cause or permit the emission of any air contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business		3M



Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal & State = F) (State Only = S)	Description	Testing	MRRR Reference
2.1.9	WAC 173-400-040(7) 8/20/93 WAC 173-400-040(7) 07/11/02 40 CFR 60.12	F F F	No person shall conceal or mask an emission of an air contaminant		1M
2.1.10	WAC 173-400-200(2) 8/20/93 WAC 173-400-200(2) 07/11/02	F S	No source may use dispersion techniques or excess stack height to meet ambient air quality standards or PSD increment limitations		1M
2.1.11	WAC 173-400-205 8/20/93 WAC 173-400-205 07/11/02	F S	Varying the rate of emission of a pollutant according to atmospheric conditions is prohibited, except as directed according to air pollution episode regulations		1M
2.1.12	RCW 70.94.040 1/4/01	S	Causing air pollution in violation of Chapter 70.94 RCW is unlawful		1M
2.1.13	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 8.3 NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Condition 8.3 Chapter 173-425 WAC – Restriction on Open Burning	F F F	No open burning is allowed on site		2M
2.1.14	WAC 173-400-040, 1 <sup>st</sup> ¶ 8/20/93 WAC 173-400-040, 1 <sup>st</sup> ¶ 07/11/02 RCW 70.94.154(1)	F S	All emissions units are required to use RACT		1M

## 2.2 Section #2, Hogged Fuel Boiler

**TABLE 2.2**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.2.1*	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Conditions 2.3 and 5.1	F	Opacity shall be $\leq 10\%$ (ten consecutive six minute averaging period)		<b>11M, 13M</b>
2.2.2*	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Condition 2.2	F	Opacity as measured visually shall be $\leq 10\%$ over a six minute time period	RM 9	<b>11M, 13M</b>
2.2.3*	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Conditions 2.1 and 7.2	F	PM $\leq 0.030$ gr/dscf corrected to 7% O <sub>2</sub> or $\leq$ 4.25 lbs/hr (fronthalf and backhalf) – Testing required every five years	Every 5 years: RM 1,2,3,4,5,9, 25a, and 202	<b>9M, 10M, 15M</b>
2.2.4	WAC 173-400-040 (6, 1 <sup>st</sup> ¶) 8/20/93 WAC 173-400-040(6) 07/11/02	F  S	SO <sub>2</sub> $\leq 1000$ ppm @ 7% O <sub>2</sub> (Sixty minute average)	RM 6	<b>7M</b>
2.2.5	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Conditions 1, 5.1, 5.2, 5.3, 6, 7.3	F	Steam production shall not exceed 300 million pounds per year		<b>12M</b>
2.2.6	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Condition 8.1	F	No backup fuel is allowed for the hogged fuel boiler		<b>2M</b>
2.2.7	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Section II.3. RACT (PM)	F	PM emissions from the hogged fuel boiler shall be controlled by a multiple cyclone followed by an electrostatic precipitator		<b>1M</b>
2.2.8	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Section II.3. RACT (PM, CO, VOC's)	F	Hogged fuel boiler shall be operated with an over- fire air system and good combustion control.		<b>5M</b>

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.2.9	WAC 173-400-070(2)(b) 8/20/93 ----- WAC 173-400-070(2)(b) 07/11/02	F  S	All hogged fuel boilers shall utilize RACT and shall be operated and maintained to minimize emissions		5M
2.2.10	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Conditions 4 and 8.7	F	The boiler and all associated equipment shall be operated in a manner consistent with the O&M manual, ash handling plan, and NOC application		5M
2.2.11	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Condition 8.6	F	Approval Order and O&M Manual shall be in the working vicinity and available to employees in direct operation of the hogged fuel boiler		2M
2.2.12	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Condition 6	F	O&M manual shall be kept updated		14M
2.2.13	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Condition 1	F	Any modification to plant or operating procedures shall be reported to Ecology		2M
2.2.14	NOC DE93AQ-E113 1 <sup>st</sup> Amendment Issued 10/21/03 Approval Condition 8.4	F	Order No. DE93AQ-E113 becomes void if operation is discontinued for 18 months		1M
2.2.15	40 CFR 64.7(b)	F	The permittee shall maintain the monitoring equipment specified in 10M, 11M and 15M, including but not limited to, maintaining necessary parts for routine repairs of the equipment		2M

### 2.3 Section #3, Natural Gas Boiler

**TABLE 2.3**

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal & State = F) (State Only = S)	Description	Testing	MRRR Reference
2.3.1	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 2.6	F	Opacity shall not exceed 10%, averaged over a ten minute period	RM 9	4M
2.3.2*	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 2.3	F	PM emissions shall not exceed 0.01 gr/dscf @ 7% O <sub>2</sub> or 0.272 lbs/hr	RM 5 and 202	7M
2.3.3	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Conditions 2.1 and 7.3	F	NO <sub>x</sub> emissions shall be ≤ 40 ppm, dry @ 3% O <sub>2</sub> and ≤ 1.28 lbs/hr	RM 7 (Every five years)	8M
	40 CFR 60.8	F			
2.3.4*	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 2.2	F	SO <sub>x</sub> emissions shall be ≤ 1 ppm or ≤ 0.017 lbs/hr @ 7% O <sub>2</sub> and averaged over any sixty (60) consecutive minutes	RM 6	7M
2.3.5	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 2.4	F	VOC emissions shall be ≤ 0.453 lbs/hr	RM 25	7M
2.3.6	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 2.5	F	CO emissions shall be ≤ 4.08 lbs/hr	RM 10	7M

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.3.7	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Conditions 1, 5, 6, and 7.4 <hr/> 40 CFR 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR 60.48c(g), 40 CFR 60.48c(i), 07/01/01	F <hr/> F	Boiler natural gas usage shall be limited to ≤ 217 MMcf/yr		<b>16M</b>
2.3.8	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 1	F	Boiler steam production shall be limited to ≤ 175.2 MMBtu/yr		<b>16M</b>
2.3.9	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 8.1 and Sections I.3 and I.4 – BACT & T-BACT (PM, SO <sub>2</sub> , NO <sub>x</sub> )	F	No backup fuel is allowed for the natural gas boiler – combustion of natural gas only		<b>2M</b>
2.3.10	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Section I.3. BACT and Section I.4. T-BACT (PM, SO <sub>2</sub> , NO <sub>x</sub> , CO, VOC's)	F	Good combustion control will be utilized in order to minimize emissions at all times		<b>5M</b>
2.3.11	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Section I.3. BACT and Section I.4. T-BACT (NO <sub>x</sub> )	F	Emissions of nitrogen oxides will be controlled by a low-NO <sub>x</sub> burner		<b>1M</b>
2.3.12	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 1 <hr/> 40 CFR 60.7(a)(4)	F <hr/> F	Any modification to plant or operating procedures shall be reported to Ecology		<b>18M</b>

Condition Number	Condition, Emission Standard, or Work Practice	Enforceability (Federal & State = F) (State Only = S)	Description	Testing	MRRR Reference
2.3.13	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 7.5	F	Provision of, and safe access to, sampling ports and platforms		1M
2.3.14	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 8.7	F	Approval Order and O&M Manual shall be in the working vicinity and available to employees in direct operation of the natural gas boiler		2M
2.3.15	NOC DE 92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 8.8, 8.9 ..... 40 CFR 60.11(d)	F      F	Operation of equipment shall be conducted in a manner consistent with good air pollution control practice for minimizing emissions as well as with the NOC application and O&M Manual		5M
2.3.16	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 8.4	F	Order No. DE92AQ-E145 becomes void if operation is discontinued for 18 months		1M
2.3.17	NOC DE92AQ-E145 2 <sup>nd</sup> Amendment Issued 01/18/96 Approval Condition 6	F	O&M manual shall be kept updated		17M

## 2.4 Section #4, Lumber Drying Kilns

The Lumber Drying Kilns and all sources of air emissions associated with the process are subject to those conditions, emission standards, and work practices included in Section 1. “Standard Conditions”, Section 2.1 “Section #1 Facility Wide” and the associated Monitoring Recordkeeping and Reporting Requirements in Section 3.

## 2.5 Section #5, Wood Waste Collection & Transport System (excluding baghouses)

The Wood Waste Collection & Transport System and all sources of air emissions associated with the processes (excluding baghouses) are subject to those conditions, emission standards, and work practices included in Section 1. “Standard Conditions”, Section 2.1 “Section #1 Facility Wide Requirements” and the associated Monitoring Recordkeeping and Reporting Requirements in Section 3. In addition, Cyclone #8 (Chip Surge Bin) is subject to those conditions, emission standards, and work practices included in “Section 2.7 Cyclone #8 (Chip Surge Bin) – Compliance Assurance Monitoring”.

## 2.6 Section #6, Planer Baghouse and Truck Bin Baghouse

**TABLE 2.6**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.6.1	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 2.1	F	Opacity from each baghouse exhaust shall be $\leq 5\%$ , averaged over a six minute period	RM 9	<b>4M</b>
2.6.2	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 8.2	F	No visible emissions shall be allowed from the baghouse catch systems.	RM 9	<b>4M</b>
2.6.3	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Conditions 2.2, 5, 6, and 7	F	Particulate Matter emissions from each baghouse exhaust shall be $\leq 0.010$ gr/dscf exhaust gas	RM 5 RM 202	<b>10M, 19M, 21M</b>
2.6.4	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 1	F	Any planned modification to the baghouse or its operating procedures shall be reported to Ecology		<b>2M</b>
2.6.5	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Section 3 BACT (PM)	F	Two 99.97% efficient ( $> 5$ micron particle size) baghouses shall be installed, each with an air to cloth ratio of 8:1		<b>1M</b>
2.6.6	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 3	F	O&M manual shall be kept updated to reflect any modifications		<b>20M</b>
2.6.7	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 8.1	F	Operation of planer cyclones or shavings truck bins without the baghouses operating shall be prevented by electrical interlocks, some other fail safe device, or an administrative requirement stated in the O&M manual		<b>2M</b>

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.6.8	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 8.2	F	The material collected by the planer baghouse shall be routed through rotary airlocks to an enclosed catch system. The material collected by the truck bin baghouse falls directly back into the truck bin and is recycled.		<b>1M</b>
2.6.9	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 8.3	F	The baghouse catch will be collected and disposed of in accordance with good operating practices and in accordance with local solid waste requirements		<b>5M</b>
2.6.10	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 9.2	F	Order No. DE00AQER-1615 becomes void if operation is discontinued for 18 months		<b>1M</b>
2.6.11	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 9.4	F	Approval Order shall be in the working vicinity and available to employees in direct operation of the baghouses		<b>2M</b>
2.6.12	NOC DE00AQER-1615 2 <sup>nd</sup> Amendment Issued 10/21/03 Approval Condition 9.5, 9.6, 9.7	F	Operation of equipment shall be conducted in a manner consistent with information included in NOC application and O&M Manual		<b>5M</b>
2.6.14	40 CFR 64.7(b)	F	The permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the equipment		<b>2M</b>



## 2.7 Section #7, Cyclone #8 (Chip Surge Bin) – Compliance Assurance Monitoring

**TABLE 2.7**

<b>Condition Number</b>	<b>Condition, Emission Standard, or Work Practice</b>	<b>Enforceability (Federal &amp; State = F) (State Only = S)</b>	<b>Description</b>	<b>Testing</b>	<b>MRRR Reference</b>
2.7.1	WAC 173-400-060 8/20/93	F	Emissions of particulate material from any operation shall not exceed 0.1 grain/dscf of exhaust gas	RM 5	<b>10M, 21M</b>
	WAC 173-400-060 07/11/02	S			
2.7.2	40 CFR 64.7(b)	F	The permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the equipment		<b>2M</b>

### **3. Monitoring, Recordkeeping, and Reporting Requirements (MRRR)**

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[WAC 173-401-630(1)], [WAC 173-401-615(1),(2)]

**1M.** The permittee shall conscientiously monitor site operations and promptly report any deviations.  
[WAC 173-401-615(1)(b), 09/16/02 ]

**2M.** At least once every twelve (12) months, the permittee shall review actual operations and any other relevant information to determine if facility operations are being conducted in accordance with each specific requirement.

The permittee shall maintain records that include the date such reviews occur, the name of the person conducting the review, the information reviewed, summary information on any deviations identified and date and time when corrective action was initiated and completed.

[WAC 173-401-615(1)(b), 09/16/02 ]

**3M.** The permittee shall maintain records of all complaints received. Ecology shall be notified within three (3) working days of receipt of any complaints. The permittee shall address and respond to all complaints within three (3) working days of receipt of the complaint. The recordkeeping shall include the following with regard to the complaint and the associated deviation:

- 1) A record of all written complaints, complaints received by telephone or complaints received in person,
- 2) Time, date, and duration of the deviation,
- 3) Cause of the deviation,
- 4) Estimate of excess emissions and magnitude of deviation, and
- 5) Corrective action taken, and the results of such action.

[WAC 173-401-615(1)(b), 09/16/02 ]

**4M.** The permittee shall conduct monitoring in accordance with the following.

- 1) At least once per month, as well as any time excess visible emissions are observed, the permittee shall perform surveys for the purpose of observing all emission units that are sources of potential visible and/or PM emissions to which standards apply facility-wide as well as those emission units and activities for which this MRRR is specified in the "MRRR Reference" column in the above tables. Insignificant emissions units are not subject to this MRRR requirement.

Each survey shall be performed as follows:

- a) The survey shall be conducted from a location with a clear view of the emission point and where the sun is as close as possible to being directly behind the observer. The observer's location shall be at least 15 feet but not more than ¼ mile from the source.
- b) The survey shall be conducted while the relevant emission unit as well as the associated facility process is in normal operation.
- c) The observer will be educated in the general procedures for determining the presence of visible emissions (i.e. effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
- d) The survey shall consist of a minimum of four (4) consecutive 15-second visual observations of each stack or emission point to identify whether the emission point under observation exhibits

visible emissions. The observer shall look away from the emission point under observation between each observation in order to rest their eyes.

- e) The permittee shall develop a standard form to be used for the visible emissions surveys described above. A copy of the developed form shall be provided to Ecology.
- 2) Upon completion of the visual survey, the permittee's corrective actions shall be governed by the following:
- a) If visible emissions are observed to be zero, no corrective action is required.
  - b) If visible emissions are observed, the following actions shall be taken, as described below:
    - i) As soon as possible, but no later than 24 hours after visible emissions are observed, the permittee shall verify that all equipment which may affect emissions is performing its normal, designed function and being operated according to standard procedures. If any equipment is not performing as described, corrective action shall be initiated within 24 hours after the original observation of visible emissions. The corrective action taken shall return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the deviation.
      - a. If the corrective action taken results in a return to conditions under which visible emissions are not observable via the method outlined in 1) above within the 24 hour window after visible emissions were originally observed, no further corrective action is required.
      - b. If, after corrective action is taken, visible emissions are still observed, or if the necessary corrective action requires a period of time beyond the 24 hour window, the permittee shall perform ii):
    - ii) The permittee shall perform, or have performed, RM 9 on the source of the emissions. The RM 9 test shall be conducted only by personnel certified to perform RM 9 in accordance with EPA guidelines. The test shall occur as soon as possible, but no later than forty-eight (48) hours after the original observation of visible emissions.
      - a. If the visible emissions as determined by RM 9 do not exceed the applicable standard, no further corrective action is required.
      - b. If a violation of any applicable opacity standard is documented, the permittee shall perform iii):
    - iii) If a violation of any applicable opacity standard is documented, appropriate and timely action shall be initiated (as soon as possible, but no later than 24 hours after discovery of the violation via RM 9 test) to identify and correct the problem causing the opacity. The corrective action taken shall return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the violation. Once corrective action has been taken to solve the problem, the permittee shall perform, or have performed, RM 9 on the source of emissions in order to demonstrate re-establishment of normal operation. Taking corrective action does not relieve the permittee from complying with the underlying condition, emission standard or work practice, nor does it relieve the permittee from the obligation to report any permit deviations as required in Standard Condition 1.13.1
- 3) The permittee shall conduct recordkeeping in accordance with the following.
- a) The permittee shall maintain records of all RM 9 tests performed for a period of five (5) years. This recordkeeping requirement shall be satisfied by keeping the original RM 9 test form.

- b) The permittee shall maintain a list of site personnel who have been educated as described in 1), c) above.
- c) Recordkeeping with regard to each deviation shall include the following:
  - i) Time, date, and duration of the deviation,
  - ii) Cause of the deviation,
  - iii) Estimate of excess emissions and magnitude of deviation, and
  - iv) Corrective action taken, and the results of such action.
- 4) The permittee shall conduct reporting in accordance with the following.
  - a) Copies of all RM 9 test forms which either document a deviation or re-establishment of normal operation following a deviation shall be submitted to Ecology as part of the monthly deviation reports as required by Standard Condition 1.13.1. In addition to the RM 9 form, reporting shall also include copies of the visible emission observation form(s) as well as the information required under recordkeeping under 3), c) above. The permittee is not required to submit RM 9 forms for tests conducted under 2), b), ii) above, which do not document a deviation or violation.
  - b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency.  
[WAC 173-401-615(1)(b), & (3), 09/16/02 ], Conditions 2.1.1, 2.3.1, 2.6.2  
[WAC 173-401-630(1), 09/16/02 ], Conditions 2.6.1

**5M.** At least once every twelve (12) months, the permittee shall perform a complete review of the Operation and Maintenance manual, Ash Handling and Disposal Plan, Fugitive Dust Control Plan and the original Notice of Construction Order and associated application materials submitted to Ecology as appropriate for each affected emission unit and associated equipment. The purpose of this review shall be to verify that the emission unit and associated equipment is being operated in accordance with the documents stated above and with good air pollution control practices in mind.

At least once every six (6) months, the permittee shall perform a review of the operation and maintenance parameters as included in the Operation and Maintenance manual for each affected emission unit and associated equipment.

The permittee shall maintain records that include the date such reviews occur as well as the name of the person conducting the review. Upon discovery that any equipment is being operated in a manner inconsistent with any of the above mentioned documents, the permittee shall initiate corrective action within two (2) business days. All such discoveries shall be reported to Ecology as required by Standard Condition 1.13 of this permit.

[WAC 173-401-615(1)(b), 09/16/02 ]

**6M.** At least once per month, as well as any time visible emissions are observed, the permittee shall perform brief, walk-around surveys for the purpose of determining the presence of visible emissions crossing the facility site property boundary. The surveys shall be conducted while the facility is in operation, and shall include observation for any visible emissions, including fugitive emissions, regardless of the source. Recordkeeping shall include information for each survey indicating the date the survey was performed, the name of the person performing the survey, the weather at the time of the survey, and an indication of whether any visible emissions were observed to cross the property boundary. Reporting shall consist of monthly reporting of deviations and annual certification of compliance as described in Standard Condition 1.13. Any monthly deviation reports documenting visible emissions observed to

cross the property boundary shall include the time, date and duration of the deviation, a description of the cause of the visible emissions, the corrective action taken, and the results of the corrective action.

[WAC 173-401-615(1)(b), 09/16/02 ]

- 7M.** Semi-Annually – As part of the semi-annual monitoring report, the permittee shall submit parametric monitoring data for parameters that are used to calculate emissions. This may include actual hours of operation, actual steam production, etc.

Annually – As part of the annual emissions inventory submittal required under Standard Condition 1.13.4, emissions shall be quantified by multiplying the appropriate recorded operating parameter (fuel usage, hours of operation, steam production, etc..) by an emission factor derived from the most recent source testing. If test-derived factors are unavailable, use the most recent emission factor published by USEPA. In the event that the most recent published data provides a range of emission factors, the calculation shall be performed using the most conservative factor within the provided range. Use of less conservative emission factors may be used only upon written approval by Ecology. In the event that USEPA emission factors are either inappropriate or unavailable, the permittee shall propose an alternative emission factor (or emission estimation method) that may be used upon written approval by Ecology.

Calculations should be adjusted for percent oxygen as required by the applicable requirement and should indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emission inventory submittal shall include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculational method, and an example of the calculational method used.

[WAC 173-401-615(1)(b), 09/16/02 ]

- 8M.** Testing as described by the applicable requirement shall be performed at least once every five (5) years.

Semi-Annually – As part of the semi-annual monitoring report, the permittee shall submit parametric monitoring data for parameters that are used to calculate emissions. This may include actual fuel usage, actual hours of operation, actual steam production, etc.

Annually – As part of the annual emissions inventory submittal required under Standard Condition 1.13.5, emissions shall be quantified by multiplying the appropriate recorded operating parameter (fuel usage, hours of operation, steam production, etc..) by an emission factor derived from the most recent source testing.

Calculations should be adjusted for percent oxygen or percent carbon dioxide as required by the applicable requirement and should indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emission inventory submittal shall include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculational method, and an example of the calculational method used.

[WAC 173-401-615(1)(b), 09/16/02 ], [NOC DE 92AQ-E145 2nd Amendment, Issued 01/18/96, Approval Condition 7.3]

- 9M.** Testing as described by the applicable requirement shall be performed at least once every five (5) years. The following conditions shall apply to the testing:

- 1) Particulate matter shall be reported for fronthalf (RM 5) and backhalf (RM 202).
- 2) The testing will be conducted with the boiler at a minimum of ninety (90) percent of maximum production rate.

- 3) The testing will consist of two runs at normal boiler operation, one run with a grate ash cleaning evolution in progress, and one run with a soot blowing evolution in progress.
- 4) RM 3 shall utilize multipoint integrated sampling for O<sub>2</sub>, carbon dioxide, and carbon monoxide.
- 5) The test report shall be sent to Ecology within thirty (30) days after the testing.
- 6) The CEMS shall be installed and operating prior to and during source testing.
- 7) Alternate testing may be proposed in writing by the permittee and must be approved in writing by Ecology.

Semi-Annually – As part of the semi-annual monitoring report, the permittee shall submit parametric monitoring data for parameters that are used to calculate emissions. This may include actual fuel usage, actual hours of operation, actual steam production, etc.

Annually – As part of the annual emissions inventory submittal required under Standard Condition 1.13.5, emissions shall be quantified by multiplying the appropriate recorded operating parameter (fuel usage, hours of operation, steam production, etc..) by an emission factor derived from the most recent source testing.

Calculations should be adjusted for percent oxygen or percent carbon dioxide as required by the applicable requirement and should indicate pollutant emission rate and concentration in the same units as the limit(s) specified in the applicable requirement(s). The emission inventory submittal shall include a statement clearly indicating the emission factor that is being used, justification for the use of the emission factor, clear identification of all operating parameters used in the calculational method, and an example of the calculational method used.

[WAC 173-401-615(1)(b), 09/16/02 ], [WAC 173-401-630(1), 09/16/02 ], [NOC DE 92AQ-E145 2nd Amendment, Issued 01/18/96, Approval Condition 7.3]

**10M.** Monitoring, Recordkeeping, and Reporting as required by 40 CFR 64 – CAM shall be subject to the following general conditions:

- 1) The owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emission unit is operating, with the following qualifications:
  - a) Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement.
  - b) The owner or operator shall use all data collected during all other periods in assessing the operation of the control device and associated control system.
  - c) “Monitoring malfunction” is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 CFR 64.7(c), 07/01/01], [40 CFR 64.7(a), 07/01/01]

- 2) Semi-annual CAM monitoring reports shall include the following:
  - a) Summary information on the number, duration, and cause (including unknown cause, if applicable) of deviations or violations, as applicable, and the corrective actions taken,
  - b) Summary information on the number, duration, and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks), and

- c) A description of any actions taken during the reporting period to implement any QIP's in effect.

[40 CFR 64.9(a), 07/01/01]

- 3) The following conditions shall apply to all CAM recordkeeping:

- a) The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan(s) required as well as any activities undertaken to implement a quality improvement plan, and any other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).
- b) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

[40 CFR 64.9(b), 07/01/01]

- 11M.** Continuous Emissions Monitoring System (CEMS) to measure opacity, which meets the approval requirements of the Environmental Protection Agency, is installed. The CEMS opacity meter shall conform to all provisions of Title 40, CFR Part 60, Appendix B, Performance Specification 1 - Specifications and Test Procedures for Opacity Continuous Emissions Monitoring Systems in Stationary Sources. The CEMS opacity meter shall be operated using quality assurance procedures conforming to EPA 340/1-86-010, Recommended Quality Assurance Procedures of Opacity CEMS. Chart recorder readings shall be maintained onsite and kept in a readable manner and be readily accessible for Ecology upon request.

[NOC DE 93AQ-E113 1<sup>st</sup> Amendment, Issued 10/21/03 , Approval Condition 5.1]

- 12M.** The following conditions shall apply to the monitoring, recordkeeping, and reporting required for the hogged fuel boiler.

- 1) The following monitoring equipment shall be maintained in good operating condition:
  - a) Instrumentation on the electrostatic precipitator as follows: inlet temperature gage, field voltmeter gage, secondary amperage meter, primary amperage indication, and the ability to monitor the spark rate or count.
  - b) A gage on the multicclone to measure differential pressure.
- 2) The following recordkeeping specific to the hogged fuel boiler shall be retained for a period of five (5) years and kept in an organized, legible manner readily available for inspection by Ecology personnel.
  - a) Source testing, inspection, and maintenance records.
  - b) Annual steam production records.
  - c) O&M instructions.
- 3) Reporting specific to the hogged fuel boiler shall be conducted in accordance with the following.
  - a) Total steam production for each semi-annual reporting period shall be submitted in accordance with Standard Condition 1.13 Reporting.

[NOC DE 93AQ-E113 1<sup>st</sup> Amendment, Issued 10/21/03 , Approval Conditions 1, 5.2, 6, and 7.4], [WAC 173-401-615(2)(c), 09/16/02 ], [WAC 173-401-630(1), 09/16/02 ]

**13M.** Any emission in excess of ten-percent opacity consisting of one or more consecutive six minute interval(s) shall be reported to Ecology on a monthly basis no later than thirty (30) days after the end of the month during which the deviation is discovered. The report should include the following information for each excess emission:

- 1) The date, time and duration of the deviation.
- 2) The magnitude of the deviation.
- 3) An estimate of the excess emissions.
- 4) The probable cause of the deviation.
- 5) Any corrective action taken or planned.
- 6) If corrective action is taken, the results of such action.
- 7) Any other agency contacted.

[NOC DE 93AQ-E113 1<sup>st</sup> Amendment, Issued 10/21/03 , Approval Condition 5.1], [WAC 173-401-615(1)(b), 09/16/02 ]

**14M.** The following recordkeeping specific to the hogged fuel boiler O&M manual shall be retained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel.

- 1) Normal operating parameters for the unit,
- 2) A maintenance schedule for the unit,
- 3) Monitoring and recordkeeping requirements,
- 4) A description of the monitoring procedures,
- 5) Actions for abnormal control system operation,
- 6) Operational requirements shall be identified that will prevent steam generator operations unless the electrostatic precipitator is online.

[NOC DE 93AQ-E113 1<sup>st</sup> Amendment, Issued 10/21/03 , Approval Condition 6], [WAC 173-401-630(1), 09/16/02 ]

**15M.** The following shall function as Compliance Assurance Monitoring for the hogged fuel boiler.

- 1) The permittee shall conduct monitoring in accordance with the following.
  - a) Equipment shall be provided that monitors, and displays digitally, electrostatic precipitator secondary voltage in kilovolts for both transformer/rectifier sets (T/R 1 and T/R 2).
  - b) At least once per day, the permittee shall evaluate the data obtained through recordkeeping as described in 2) a) below with respect to the following criteria:
    - i) The daily average secondary voltage shall not be less than the following trigger limits for any two (2) consecutive days.
      - a. For T/R 1, the trigger limit shall be 20 kV.
      - b. For T/R 2, the trigger limit shall be 30 kV.
    - ii) The secondary voltage as displayed for T/R 1 shall not be greater than that of T/R 2 for any six (6) consecutive recorded values (2 day period).
  - c) Under conditions that meet the criteria outlined in 1) b) above, no corrective action is required under CAM.



- d) In the event that either of the criteria outlined in 1) b) above are not met, corrective action consistent with the following shall be taken.
    - i) As soon as possible, but no later than 4 hours after discovery of the deviation, the permittee shall initiate corrective actions that are designed to return the equipment to normal operation as soon as possible and to prevent the likely recurrence of the cause of the deviation.
    - ii) Corrective action taken may include, but will not be limited to, checking rappers and vibrators for proper operation, checking multicloner and rotary screen for possible problems, checking bottom hoppers for buildup, checking ESP electrical systems, increasing the sonic blowdown, turning on the bottom vibrator, dumping the T/R set for an appropriate amount of time, obtaining manufacturer advice, and ESP shutdown and internal inspection along with appropriate subsequent maintenance and/or repair.
  - e) The secondary voltmeter shall be calibrated annually.
- 2) The permittee shall conduct recordkeeping in accordance with the following.
- a) At least three (3) times per day, the permittee shall record the values for secondary voltage for both T/R 1 and T/R 2 as displayed on the equipment provided.
  - b) At least once per day, the daily average secondary voltage for each of the T/R sets shall be calculated by computing the mean of the three (3) recorded values.
  - c) In the event of a deviation from the criteria outlined in 1) b) above, the permittee shall maintain records documenting any ESP corrective action taken, and the results of such action. The records shall be retained in a well organized manner and easily accessible for inspection by Ecology personnel.
- 3) The permittee shall conduct reporting in accordance with the following.
- a) In the event of a deviation from the criteria outlined in 1) b) above, the permittee shall submit a report as part of, or attached to, the monthly deviation report as described in Standard Condition 1.13.1. The report shall include the appropriate data as recorded documenting the date, time and duration of the deviation, the magnitude of the deviation, an estimate of the excess emissions, a description of the corrective action taken, and the results of the corrective action.
  - b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency.

[40 CFR 64.3, 64.4(d), 64.7(d), 64.7(e), 64.8, 07/01/01]

**16M.** The following conditions shall apply to the recordkeeping and reporting required for the natural gas boiler;

- 1) Natural gas boiler specific records shall be retained including the following information. The information shall be retained for five (5) years and kept in a legible and readily accessible manner for inspection by Ecology personnel in accordance with Standard Condition 1.6 Inspection and Entry.
  - a) Testing and inspection records.
  - b) Steam production records (annual total production).
  - c) Natural gas usage records (annual total usage, as well as daily total usage).
  - d) Organized O&M instructions and maintenance records.
- 2) Reporting specific to the natural gas boiler shall be conducted in accordance with the following.

- a) Total natural gas usage and steam production for each semi-annual reporting period shall be submitted in accordance with Standard Condition 1.13 Reporting.

[NOC DE 92AQ-E145 2nd Amendment, Issued 01/18/96, Approval Conditions 1, 5, 6, and 7.4],  
[WAC 173-401-615(2)(c), 09/16/02 ], [WAC 173-401-630(1), 09/16/02 ], [40 CFR 60.48c(g),  
07/01/01]

**17M.** The following recordkeeping specific to the natural gas boiler O&M manual shall be retained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel.

- 1) Normal operating parameters for the unit,
- 2) A maintenance schedule for the unit,
- 3) Monitoring and recordkeeping requirements,
- 4) A description of the monitoring procedures,
- 5) Actions for abnormal control system operation.

[NOC DE 92AQ-E145 2nd Amendment, Issued 01/18/96, Approval Condition 6], [WAC 173-401-630(1), 09/16/02 ]

**18M.** In the event of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies, permittee shall provide notice as required. This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. Ecology may request additional relevant information subsequent to this notice. These requirements are in addition to any pre-construction review requirements as outlined under Standard Condition 1.20.

[40 CFR 60.7(a)(4), 07/01/01]

**19M.** The following conditions shall apply to the monitoring, recordkeeping and reporting required for the planer and truck bin baghouses;

- 1) The following monitoring equipment shall be maintained in good operating condition:
  - a) A differential pressure gage across the bags, between the inlet and outlet of each baghouse,
  - b) A gage to measure the vacuum pressure of the suction fan on the planer baghouse,
  - c) Access ports shall be installed prior to any required future testing.
- 2) Baghouse specific records shall contain, in addition to all other recordkeeping requirements, the following:
  - a) The nature and details of any emergency or other situation (date/time, duration, excess emissions estimate, cause, corrective action and results of corrective action), which includes situations where the planer cyclones or the planer shavings truck bins were operated while any portion of the baghouse was not functioning properly.
  - b) A file of any performance test results.
  - c) O&M Manual maintenance records.
  - d) Baghouse bag failure records, which show the locations of failed socks in relation to baghouse configuration, and their date of replacement.

- 3) The following reports shall be sent to Ecology at the address included on page 4 of this permit within 30 days following the end of the month during which the upset occurred;
  - a) The nature and details of any emergency or other situation (date/time, duration, excess emissions estimate, cause, corrective action and results of corrective action), which includes situations where the planer cyclones or the planer shavings truck bins were operated while any portion of the baghouse was not functioning properly.
  - b) The results of any performance testing shall be sent no later than 60 days following the testing.  
[NOC DE 00AQER-1615 2<sup>nd</sup> Amendment, Issued 10/21/03 , Approval Conditions 5, 6, and 7],  
[WAC 173-401-630(1), 09/16/02 ]

**20M.** The following recordkeeping specific to the O&M manual(s) for the baghouses shall be retained in an up-to-date manner, well organized, and easily accessible for inspection by Ecology personnel:

- 1) Normal operating parameters for both baghouses,
- 2) A maintenance schedule for both baghouses,
- 3) Recordkeeping and reporting requirements for both baghouses,
- 4) A description of all monitoring procedures and instrumentation for both baghouses.

[NOC DE 00AQER-1615 2<sup>nd</sup> Amendment, Issued 10/21/03 , Approval Condition 3], [WAC 173-401-630(1), 09/16/02 ]

**21M.** The following shall function as Compliance Assurance Monitoring for the baghouses and cyclone #8.

- 1) At least once every 24 hours, as well as any time excess visible emissions are observed, the permittee shall perform surveys for the purpose of monitoring the exhaust points for the planer and truck bin baghouses as well as cyclone #8 (chip surge bin) for the presence of visible emissions.

Each survey shall be performed as follows:

- a) The survey shall be conducted from a location with a clear view of the emission point and where the sun is as close as possible to being directly behind the observer. The observer's location shall be at least 15 feet but not more than ¼ mile from the source.
  - b) The survey shall be conducted while the relevant emission unit as well as the associated facility process is in normal operation.
  - c) The observer will be educated in the general procedures for determining the presence of visible emissions (i.e. effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water).
  - d) The survey shall consist of a minimum of four (4) consecutive 15-second visual observations of each stack or emission point to identify whether the emission point under observation exhibits visible emissions. The observer shall look away from the emission point under observation between each observation in order to rest their eyes.
  - e) The permittee shall develop a standard form to be used for the visible emissions surveys described above. A copy of the developed form shall be provided to Ecology.
- 2) Upon completion of the visual survey, the permittee's corrective actions shall be governed by the following:
    - a) If visible emissions are observed to be zero, no corrective action is required.
    - b) If visible emissions are observed, the following actions shall be taken, as described below:

- i) As soon as possible, but no later than 24 hours after visible emissions are observed, the permittee shall verify that all equipment which may affect emissions is performing its normal, designed function and being operated according to standard procedures. If any equipment is not performing as described, corrective action shall be initiated within 24 hours after the original observation of visible emissions. The corrective action taken shall return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the deviation.
    - a. If the corrective action taken results in a return to conditions under which visible emissions are not observable via the method outlined in 1) above within the 24 hour window after visible emissions were originally observed, no further corrective action is required.
    - b. If, after corrective action is taken, visible emissions are still observed, or if the necessary corrective action requires a period of time beyond the 24 hour window, the permittee shall perform ii):
  - ii) The permittee shall perform, or have performed, RM 9 on the source of the emissions. The RM 9 test shall be conducted only by personnel certified to perform RM 9 in accordance with EPA guidelines. The test shall occur as soon as possible, but no later than forty-eight (48) hours after the original observation of visible emissions.
    - a. If the visible emissions as determined by RM 9 do not exceed the applicable standard, no further corrective action is required.
    - b. If a violation of any applicable opacity standard is documented, the permittee shall perform iii):
  - iii) If a violation of any applicable opacity standard is documented, appropriate and timely action shall be initiated (as soon as possible, but no later than 24 hours after discovery of the violation via RM 9 test) to identify and correct the problem causing the opacity. The corrective action taken shall return the equipment to normal operation as soon as possible and be designed to prevent the likely recurrence of the cause of the violation. Once corrective action has been taken to solve the problem, the permittee shall perform, or have performed, RM 9 on the source of emissions in order to demonstrate re-establishment of normal operation. Taking corrective action does not relieve the permittee from complying with the underlying condition, emission standard or work practice, nor does it relieve the permittee from the obligation to report any permit deviations as required in Standard Condition 1.13.1
- 3) The permittee shall conduct recordkeeping in accordance with the following.
- a) The permittee shall maintain records of all RM 9 tests performed for a period of five (5) years. This recordkeeping requirement shall be satisfied by keeping the original RM 9 test form.
  - b) The permittee shall maintain a list of site personnel who have been educated as described in 1), c) above.
  - c) Recordkeeping with regard to each deviation shall include the following:
    - j) Time, date, and duration of the deviation,
    - ii) Cause of the deviation,
    - iii) Estimate of excess emissions and magnitude of deviation, and
    - iv) Corrective action taken, and the results of such action.
- 4) The permittee shall conduct reporting in accordance with the following.

- a) Copies of all RM 9 test forms which either document a deviation or re-establishment of normal operation following a deviation shall be submitted to Ecology as part of the monthly deviation reports as required by Standard Condition 1.17. In addition to the RM 9 form, reporting shall also include copies of the visible emission observation form(s) as well as the information required under recordkeeping under 3), c) above. The permittee is not required to submit RM 9 forms for tests conducted under 2), b), ii) above, which do not document a deviation or violation.
- b) Upon discovery that the monitoring as designed is insufficient to provide indications of all deviations, the permittee shall notify Ecology of the monitoring deficiency.

[40 CFR 64.3, 64.4(d), 64.7(d), 64.7(e), 64.8, 07/01/01]

#### 4. Inapplicable Requirements

Ecology has determined that the entire source, including all emission units, is not subject to the following requirements at the time of permit issuance. Some of the requirements listed below may become applicable during the permit term due to an invoking event, even though the requirement is deemed inapplicable at the time of permit issuance. Such requirements shall therefore be met on a timely basis by the permittee through submittal of a compliance schedule, per WAC 173-401-510(2)(h)(iii)(B).

Inapplicable Requirement	Requirement Description	Explanation
WAC 173-400-210	Requirements of prior jurisdictions	No requirements from prior authorities apply to the permittee.
chapter 173-406 WAC	Acid Rain Regulations	The permittee does not operate an effected unit.
chapter 173-433 WAC	Emission Standards for Solid Fuel Burning Devices	A literal reading of WAC 173-433 and RCW 70.94.453(5) could lead to the conclusion that all solid fuel burning devices, without consideration of size, fall under the definition of this regulation/statute. The definition of solid fuel burning device is, "any device for burning wood, coal, or any other nongaseous and non-liquid fuel, including a wood stove and a fireplace." However, this definition, when read together with the policy statement of RCW 70.94.450 clearly indicates that the concern of the Washington State Legislature was emissions from wood stoves. RCW 70.94.450 and RCW 70.94.453 are two adjacent sections in Chapter 405 of the Laws of 1987. While it might be reasonable for the policy statement of RCW 70.94.450 to lead the Legislature to regulate other solid fuel burning space heating devices similar to wood stoves, it does not seem reasonable that such a policy statement would lead to regulation of a large industrial unit such as a hogged fuel boiler. Based upon this interpretation of the intention of RCW 70.94.453, WAC 173-433 was found to be inapplicable to the permittee. WAC 173-433 would be applicable if a wood stove, fireplace or similar device were present at the source.